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*Attorneys for Defendant/Counterclaim-Plaintiff
International Business Machines Corporation*

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF UTAH**

THE SCO GROUP, INC.,

Plaintiff/Counterclaim-Defendant,

v.

INTERNATIONAL BUSINESS MACHINES
CORPORATION,

Defendant/Counterclaim-Plaintiff.

**UNSEALED DECLARATION OF
AMY F. SORENSON IN SUPPORT OF
IBM'S MEMORANDUM IN OPPOSITION TO
SCO'S "RENEWED" MOTION
TO COMPEL**

[Docket Nos. 219 and 220]

Civil No. 2:03CV-0294 DAK

Honorable Dale A. Kimball

Magistrate Judge Brooke C. Wells

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2004 AUG -4 P 5: 52

U.S. DISTRICT COURT
DISTRICT OF UTAH

I, Amy F. Sorenson, declare as follows:

1. I represent IBM in the lawsuit brought by SCO against IBM, entitled The SCO Group, Inc. v. International Business Machines Corporation, Civil No. 2:03CV-0294 DAK (D. Utah 2003). This declaration is submitted in support of Defendant/Counterclaim-Plaintiff IBM's Memorandum in Opposition to SCO's "Renewed" Motion to Compel.

2. Attached hereto are true and correct copies of the following documents:

- (a) Exhibit 1 is a letter from Peter Ligh to Mark J. Heise, dated June 16, 2004.
- (b) Exhibit 2 is a letter from Mark J. Heise to Peter Ligh, dated July 6, 2004.
- (c) Exhibit 3 is SCO's Memorandum in Support of Its Motion to Compel, dated November 4, 2003.
- (d) Exhibit 4 is SCO's First Request for Production of Documents and First Set of Interrogatories, dated June 24, 2003.
- (e) Exhibit 5 is IBM's Second Supplemental Responses and Objections to SCO's First Set of Interrogatories, dated April 19, 2004.
- (f) Exhibit 6 is a letter from Peter Ligh to Mark J. Heise, dated April 19, 2004.
- (g) Exhibit 7 is SCO's Second Set of Interrogatories and Second Request for Production for Production of Documents, dated December 4, 2003.
- (h) Exhibit 8 is a letter from Peter Ligh to Mark J. Heise, dated March 9, 2004.

- (i) Exhibit 9 is a letter from Mark J. Heise to Peter Ligh, dated March 26, 2004.
- (j) Exhibit 10 is a letter from Mark J. Heise to Peter Ligh, dated June 4, 2004.
- (k) Exhibit 11 is SCO's Supplemental Answer to IBM's Interrogatory Number Ten, dated October 10, 2003.
- (l) Exhibit 12 is a chart identifying individuals from whom SCO produced documents but did not identify in its interrogatory responses.
- (m) Exhibit 13 is Attachments A and F from IBM's Third Supplemental Responses and Objections to SCO's First Set of Interrogatories, served on August 4, 2004.
- (n) Exhibit 14 is a letter from Peter Ligh to Mark J. Heise, dated August 4, 2004.

3. I declare under penalty of perjury that the foregoing is true and correct.

Executed: August 4th, 2004.

Salt Lake City, Utah



Amy F. Sorenson

CERTIFICATE OF SERVICE

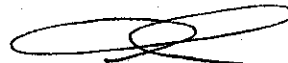
I hereby certify that on the 4th day of August, 2004, a true and correct copy of the foregoing was hand delivered to the following:

Brent O. Hatch (w/ exhibits)
Mark F. James
HATCH, JAMES & DODGE, P.C.
10 West Broadway, Suite 400
Salt Lake City, Utah 84101

and was sent by U.S. Mail, postage prepaid, to the following:

Stephen N. Zack (w/o exhibits)
Mark J. Heise
BOIES, SCHILLER & FLEXNER LLP
100 Southeast Second Street, Suite 2800
Miami, Florida 33131

Robert Silver (w/ exhibits)
BOIES, SCHILLER & FLEXNER LLP
333 Main Street
Armonk, New York 10504



Amy F. Sorenson

Exhibits/
Attachments
to this document
have **not** been
scanned.

Please see the
case file.